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16 Attorneys for Cross-Claim Defendant  
17 IRONSHORE SPECIALTY INSURANCE COMPANY

18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SAN FRANCISCO DIVISION**

21 **ILLINOIS UNION INSURANCE**  
22 **COMPANY, an Illinois corporation**

23 Plaintiff,

24 v.

25 **INTUITIVE SURGICAL, INC., a Delaware**  
26 **corporation,**

27 Defendant.

28 **NAVIGATORS SPECIALTY INSURANCE**  
**COMPANY, a Delaware corporation**

Plaintiff,

v.

Case No.: 3:13-cv-04863-JST  
Case No.: 3:13-cv-005801-JST

**STIPULATION AND ~~PROPOSED~~**  
**ORDER TO EXTEND TIME TO**  
**RESPOND TO PLAINTIFF'S**  
**COMPLAINT**

Judge: Honorable J. Tigar

1 INTUITIVE SURGICAL, INC., a Delaware  
2 corporation,

3 Defendant.

4  
5 INTUITIVE SURGICAL, INC., a Delaware  
6 Corporation,

7 Cross-Complainant,

8 v.

9 IRONSHORE SPECIALTY INSURANCE  
10 CO., an Arizona corporation,

11 Cross Defendant.  
12

13 WHEREAS, defendant Intuitive Surgical, Inc. (“Intuitive”) filed its Cross-Complaint in this  
14 action against defendant Ironshore Specialty Insurance Co. (“Ironshore”) on March 3, 2015;

15 WHEREAS, on March 19, 2015, the parties stipulated to an extension of the time for  
16 Ironshore to answer, plead or otherwise move in response to the Cross-Complaint until April 10,  
17 2015 (Doc. 62);

18 WHEREAS, Ironshore has requested a further extension of two business days, to April 14,  
19 2015, to accommodate scheduling conflicts;

20 WHEREAS, on this 10<sup>th</sup> day of April 2015, Intuitive agreed to Ironshore’s request for a  
21 extension of time through and including April 14, 2015 to respond or otherwise plead to the Cross-  
22 Complaint;

23 WHEREAS, the requested extension will not affect any other deadlines in the case;

24 Accordingly, IT IS HEREBY STIPULATED AND AGREED between the Intuitive and  
25 Ironshore, pursuant to Civ. L. R. 6-2(a) that Ironshore shall have an extension of time, through and  
26 including April 14, 2015, within which to respond to the Cross-Complaint filed by Intuitive.  
27  
28

1 Dated: April 10, 2015

HANGLEY ARONCHICK SEGAL PUDLIN &  
SCHILLER

2 By: /s/Sharon F. McKee  
3 Ronald P. Schiller  
4 Sharon F. McKee  
5 Jacqueline R. Dungee

LAFAYETTE & KUMAGAI LLP

6 By: /s/Gary T. Lafayette  
7 Gary T. Lafayette  
8 April P. Santos

9 Attorneys for Cross-Claim Defendant  
IRONSHORE SPECIALTY INSURANCE  
COMPANY

10 Dated: April 10, 2015

SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP

11 By: /s/Peter Luneau  
12 Peter Luneau  
13 Thomas E. Haroldson  
14 Raoul Kennedy

15 Attorneys for Cross-Claim Plaintiff  
INTUITIVE SURGICAL, INC.


16 **SIGNATURE ATTESTATION**

17 I hereby attest that I have obtained the concurrence of Peter Luneau, counsel for Cross-  
18 Complainant, for the filing of this stipulation.

19  
20 /s/ Sharon F. McKee  
21 SHARON F. MCKEE

22  
23 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

24 Dated: April 10, 2015

  
25 Honorable Jon S. Tiger  
26 United States District Court Judge  
27  
28